

DLA Piper LLP (US) 1251 Avenue of the Americas 27th Floor New York, New York 10020-1104 www.dlapiper.com

March 15, 2023 *VIA ECF*

The Honorable Sarah Netburn United States District Court, SDNY 40 Foley Square, Room 219 New York, New York 10007

Re: Nike, Inc. v. StockX LLC, Case No. 1:22-cv-00983-VEC (S.D.N.Y.)

Dear Judge Netburn:

Pursuant to Your Honor's Individual Rule III(F), Nike Inc. ("Nike") respectfully submits this letter regarding the requested sealed treatment of Nike's discovery Letter Motion filed today (the "Letter Motion").

The Letter Motion raises to the Court ripened discovery disputes with StockX LLC ("StockX") and sets forth the factual and legal basis to compel StockX to produce relevant and responsive documents and testimony. Nike's Letter Motion and the exhibits thereto reference material that StockX has designated as confidential pursuant to the July 14, 2022 Stipulated Protective Order entered in this case (Dkt. No. 52). As such, Nike is filing portions of its Letter Motion and the exhibits thereto under seal pursuant to Paragraph 14 of the Protective Order with appropriate redactions for material in the Letter Motion that is covered by StockX's claim of confidentiality. Nike respectfully requests the Court's approval of this sealed and redacted filing.

Respectfully submitted,

Tamar Y. Duvdevani

Counsel for Plaintiff Nike, Inc.

cc: Counsel of Record via ECF